

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA          :      GOVERNMENT'S
                                   :      FORFEITURE BILL
                                   :      OF PARTICULARS
                                   :
                                   :
      -v-                          :
                                   :
VADIM CHERVIN,                   :      S7 10 Cr. 918 (RPP)
      a/k/a "Vadik,"             :
LYNN BRAUNSTEIN,                 :
WILLIAM GIBBS,                   :
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                                   :
      Defendants.                :
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Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offense alleged in Counts One and Two of the S7 Indictment, as alleged in the Indictment's Forfeiture Allegations, includes but is not limited to the following:

Chase Bank Cashier's check # 4553069435 made payable to the United States Marshals Service dated 12/15/2010 in the amount of \$8,700.00;

Bank of America Cashier's Check # 9495420588 dated 12/24/2010 in the amount of \$13,500.00;

All funds on deposit in Account # 9485579655 at Bank of America, N.A. held in the name of "Michael J. Lamond P.C. Attorney Trust Account IOLA Fund" (the "Lamond 9655 Account") and all property traceable thereto;

All funds up to and including \$4,000 on deposit in Account # 9485579647 at Bank of America, N.A., held in the name of "Michael J. Lamond P.C.," (the "Lamond 9647 Account") and all property traceable thereto;

All funds up to and including \$6,000 on deposit in Account # 483032033963 at Bank of America held in the name of "Martha L. Solimani and Luz Adriana Mejia Castano" (the "Luz Mejia Account") and all property traceable thereto;

All funds up to and including \$5,760 on deposit in Account # 483007465359 at Bank of America held in the name of "Spring Medical Office PC" (the "Spring Medical Account") and all property traceable thereto;

All funds up to and including \$8,400 on deposit in Account # 483025596446 at Bank of America held in the name of "Global Neurology Consultants LLC" (the "Global Neuro Account") and all property traceable thereto;

All funds up to and including \$5,600 on deposit in Account # 0030015648 at Clifton Savings Bank held in the name of "Raphael Osherooff" (the "Osherooff Clifton Account 1") and all property traceable thereto;

All funds up to and including \$5,800 on deposit in Account # 0039706 at Clifton Savings Bank held in the name of "Raphael Osherooff" (the "Osherooff Clifton Account 2") and all property traceable thereto;

All funds up to and including \$3,192 on deposit in Account # 675801362 at HSBC Bank USA held in the name of "Empire Physical Medical Supply Inc." ("Empire Account-1") and all property traceable thereto;

All funds up to and including \$4033 on deposit in Account # 675801389 at HSBC Bank USA held in the name of "Empire Physical Medical Billing Inc" ("Empire Account - 2") and all property traceable thereto;

All funds up to and including \$4,166 on deposit in Account # 80281518 at Citibank N.A. held in the name of "Quasen Chowdruy" (the "Chowdhury Account") and all property traceable thereto;

All funds up to and including \$6,950 on deposit in Account # 9979905537 at Citibank N.A. held in the name of "Vyacheslav Dobrer" (the "Dobrer Account") and all property traceable thereto;

All funds up to and including \$8,903 on deposit in Account # 9960073881 at Citibank N.A. held in the name of "Barclay Billing" (the "Barclay Account") and all property traceable thereto;

All funds up to and including \$51,688 on deposit in Account # 9955537485 at Citibank N.A. held in the name of "Parkway Billing" (the "Parkway Account") and all property traceable thereto;

All funds up to and including \$11,977 in Account # 9945369879 on deposit at Citibank N.A. held in the name of "Gref Consulting" (the "Gref Account") and all property traceable thereto;

All funds up to and including \$21,732 on deposit in Account # 47624427 at Citibank N.A. held in the name of "Medical Consulting and Billing Company" (the "Medical Consulting Account") and all property traceable thereto;

All funds up to and including \$4,978 on deposit in Account # 1500780459 at Signature Bank held in the name of "Shtrahman Associates Inc" (the "Shtrahman Signature Account") and all property traceable thereto;

All funds up to and including \$8,914 on deposit in Account # 6803005633 at Banco Popular held in the name of "Ches Consultant Group Inc" (the "Banco Popular Ches Account") and all property traceable thereto;

All funds up to and including \$19,000 on deposit in Account # 2171105667 at Capital One Bank held in the name of "Lynn Braunstein" (the "Braunstein Account"), and all property traceable thereto;

All funds up to and including \$6,000 in Account # 11000911378504 at M&T Bank held in the name of American Eagle Electric, and all funds traceable thereto;

All funds up to and including \$20,000 on deposit in Account # 763532546 at JP Morgan Chase Bank held in the name of "Karlo V. Gigineishvili and Vladimir Gigineishvily" (the "Gigineishvily Account") and all property traceable thereto;

All funds up to and including \$11,800 on deposit in Account # 826947491 at JP Morgan Chase Bank held in the name of "Ocean Top Medical Study" (The "Ocean Top Medical Account") and all property traceable thereto;

All funds up to and including \$4,800 on deposit in Account # 4412087151 at JP Morgan Chase Bank held in the name of "Peaktop Inc" (the "Peaktop Account") and all property traceable thereto;

All funds up to and including \$3,120 on deposit in Account # 904605280465 at JP Morgan Chase Bank held in the name of "Rem Consulting Services" (The "Rem Consulting Account") and all property traceable thereto;

All funds up to and including \$8,903 on deposit in Account # 136502690765 at JP Morgan Chase Bank held in the name of "Shtrahman Associates Inc" (The "Shtrahman Chase Account") and all property traceable thereto;

All funds on deposit in Account # 4252782292 at TD Bank, N.A.

held in the name of "Total Body Diagnostic Medical Supply Inc" (the "Total Body 2292 Account") and all property traceable thereto;

All funds on deposit in Account # 4249976303 at TD Bank, N.A. held in the name of "Total Body Medical Diagnostic PC" (the "Total Body 6303 Account") and all property traceable thereto;

All funds up to and including \$11,703 on deposit in Account # 7917005196 at TD Bank, N.A. held in the name of "Golden Hands Chiropractic Inc" (The "Golden Hands Account") and all property traceable thereto;

All funds up to and including \$31,600 on deposit in Account # 3451934140 at TD Bank, N.A. held in the name of "KC Medical Management Resources LLC" (The "KC Medical Account") and all property traceable thereto;

All funds up to and including \$13,600 on deposit in Account # 7924448488 at TD Bank, N.A. held in the name of "NC Systems Inc" (the "NC Systems Account") and all property traceable thereto;

All funds up to and including \$33,850 on deposit in Account # 4251800475 at TD Bank, N.A. held in the name of "New Broadway Medical PC" (the "New Broadway Account") and all property traceable thereto;

All funds up to and including \$5,400 on deposit in Account # 3452145808 at TD Bank, N.A. held in the name of "Raphael Osheroff" (the "Osheroff TD Account") and all property traceable thereto;

All funds up to and including \$10,300 on deposit in Account # 7926602728 at TD Bank held in the name of "Harold Pina" (the "Pina Account") and all property traceable thereto;

All funds up to and including \$2,300 on deposit in Account # 7926534814 at TD Bank held in the name of "Targee Medical Services PC" (the "Targee Account") and all property traceable thereto;

All funds up to and including \$1,000 on deposit in Account # 7918522496 at TD Bank held in the name of "Total Body Chiropractic PC" (the "Total Body Chiro Account") and all property traceable thereto;

All funds up to and including \$30,000 on deposit in Account # 3454045002 at TD Bank held in the name of "Valentin Vavrenyuk" (the "Vavrenyuk Account") and all property traceable thereto;

Check in the amount of \$209.03 from Corvel Corp. to AVR Medical Supply Inc. seized from 3029 Coney Island Ave, Brooklyn, New York;

Check in the amount of \$705 from Liberty Mutual to AVR Medical Supply Inc. seized from 3029 Coney Island Ave, Brooklyn, New York;

Insurance checks seized from 34-11 Queens Blvd, Long Island City, New York;

Two checks totaling \$32,988.05 payable to Banyan seized from 43-21 34th Street, Long Island City, New York; and

Thirteen insurance checks totaling \$20,198.54 payable to Total Body Diagnostics seized from 43-21 34th Street, Long Island City, New York;

The Government further gives notice that, as an independent and separate basis, the items described above are forfeitable as substitute assets, pursuant to Title 21, United States Code, Section 853(p), as further alleged in the Indictment.

Dated: New York, New York  
June 20, 2012

Respectfully Submitted,

PREET BHARARA  
United States Attorney  
/s/ J.P.H.

By: \_\_\_\_\_  
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